

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TAYLOR D. PENDLETON, an individual,

Plaintiff,

vs.

10Q LLC, a California Limited Liability
Company; PROPELR MUSIC, LLC, an Illinois
Limited Liability Company; MARRIANI
RECORDS, an Illinois corporation; ANTOINE
REED p/k/a “Sir Michael Rocks,” an individual;
and DOES 1 through 100, inclusive

Defendants.

Case No.: 1:23-cv-04708

CLERK’S ENTRY OF RULE 55(a) DEFAULT
UPON DEFENDANTS PROPELR MUSIC, LLC
AND MARRIANI RECORDS

I, KRISTINA WILSON, the undersigned affiant, state the following under oath:

1. I am over the age of eighteen (18) and I am capable of making this declaration.
2. I am one of the attorneys of record for the Plaintiff in the above-captioned matter.
3. I am fully familiar with the facts set forth herein, and if called upon as a witness, could testify competently thereto.
4. I retained the services of Chicagoland Process Services (“Chicagoland”) a legal services company to serve the Summons and Complaint in this action on Defendants PROPELR MUSIC, LLC (“Propelr”) and MARRIANI RECORDS (“Marriani”) (collectively, the “Defendants”).
5. On November 13, 2023, Chicagoland served Propelr and Marriani at their respective principal places of business located at 1525 N. Elston Avenue, Suite 200, Chicago, Illinois 60642 as indicated by their respective registrations with the Illinois Secretary of State. *See* Exhibit “A” and Exhibit “B”.
6. A response to the Complaint was by the Defendants was therefore due on or before December 4, 2023.

1 7. To date, neither of the Defendants has filed an answer or otherwise appeared within the time
2 allowed by law, nor has either of the Defendants sought additional time within which to respond to the
3 Complaint.

4 8. As required by the Service Members Civil Relief Act, I have determined that neither Propelr, nor
5 Marriani, who are not individuals, are in active military service.

6
7 9. To the best of my knowledge, and on information and belief, as business entities, neither of the
8 Defendants are infants, or incompetent.

9 10. The claims that have been filed against the Defendants relate to allegations of negligence,
10 copyright
11 infringement and unjust enrichment, whereas the Plaintiff is seeking recovery for her damages, costs,
12 attorneys' fees, and punitive damages.
13

14
15 Under penalty of perjury under the laws of the State of Illinois, I declare that I have read the foregoing
16 Declaration and that the facts stated in it are true and correct to the best of my knowledge and that this
17 declaration was executed this 2nd day of January 2024 in Los Angeles County, California.
18
19

20
21 Kristina Wilson
22 Kristina Wilson, Esq.
23 *Admitted pro hac vice*
24
25
26
27
28

EXHIBIT

“A”

CERTIFICATE OF SERVICE

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

Case #: 1:23-cv-04708

Taylor D. pendleton

Plaintiff

vs.

10Q LLC, et al

Defendant

The undersigned, being first duly sworn, on oath deposes and says: That s(he) is now and at all the times herein mentioned was a citizen of the United States, over the age of 18, not a party to nor interested in the above entitled action, is competent to be witness therein, and that I served copies of the:

Summons & Complaint

PARTY SERVED: **PROPELR MUSIC LLC**

PERSON SERVED: **BRIAN TRAGOLIA, ATTORNEY**

METHOD OF SERVICE: **Corporate** - By leaving copies with the person identified above, apparently in charge at the office or usual place of business. I informed him/her of the general nature of the papers.

DATE & TIME OF DELIVERY: **11/13/2023 at 2:11 PM**

ADDRESS, CITY AND STATE: **1525 N. ELSTON AVE., STE 200, CHICAGO, IL 60642**

Race: **White**

Sex: **Male**

Age: **50**

Height: **5'6"**


Weight: **200**

Hair: **Brown**

Glasses: **No**

Chicagoland Process Services
10359 S. Pulaski Rd
Chicago, IL 60655
(773) 908-2418

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true. Executed on 11/14/2023.



Steven A. Stosur

Registration No: 117-001119

EXHIBIT

“B”

CERTIFICATE OF SERVICE

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

Case #: 1:23-cv-04708

Taylor D. pendleton

Plaintiff

vs.

10Q LLC, et al

Defendant

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Summons & Complaint

PARTY SERVED: **MARRIANI RECORDS**

PERSON SERVED: **BRIAN TRAGOLIA, ATTORNEY**

METHOD OF SERVICE: **Corporate** - By leaving copies with the person identified above, apparently in charge at the office or usual place of business. I informed him/her of the general nature of the papers.

DATE & TIME OF DELIVERY: **11/13/2023 at 2:11 PM**

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Steven A. Stosur

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